

TUCKER ELLIS LLP
Howard A. Kroll - SBN 100981
howard.kroll@tuckerellis.com
515 South Flower Street
Forty-Second Floor
Los Angeles, CA 90071-2223
Telephone: 213.430.3400
Facsimile: 213.430.3409

Attorneys for Plaintiff
CHRIS PRINCIPE

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHRIS PRINCIPE,

Plaintiff,

v.

TIMOTHY GLEN CURRY A/K/A
TIMOTHY TAYSHUN,

Defendant.

) Case No. 8:17-cv-00608 JLS (KESx)

) **DECLARATION OF HOWARD A.**
) **KROLL IN SUPPORT OF RESPONSE**
) **TO ORDER TO SHOW CAUSE RE**
) **DISMISSAL FOR LACK OF**
) **PROSECUTION**

I, Howard A. Kroll, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct:

1. I am a partner at Tucker Ellis LLP, and represent Chris Principe. ("Plaintiff") in the above-captioned matter. The statements made in this declaration are based on my own personal knowledge and if sworn as a witness I could testify competently thereto.

2. Based on a private investigator's report, Plaintiff discovered that Defendant Tim Tayshun's legal name is Timothy Glen Curry. Defendant's father is Glen J. Curry, a prominent Southern California Pastor and radio personality associated with the Pillars of Faith Ministries. Plaintiff also discovered that Defendant either resides in San Clemente, California or Rancho Santa Margarita, California.

3. On April 5, 2017, Plaintiff made its first attempt to serve Defendant at the residence in San Clemente. Plaintiff made other attempts to serve Defendant at this address on April 6, 7, 8, 9, 12, 13, 14, 15 and 16, but was unsuccessful.

EXHIBIT 1

Tim Tayshun

You and Tim Tayshun aren't connected on Facebook
Co-Founder / Partner at Autonet Group and Advisor at Sierra Leone Liberty Group

May 4th, 4:41pm

Howard

[Chris Principe v. Timothy Glen Curry aka Timothy Tayshun. - Complaint.pdf](#)

Howard

Mr. Curry/Tayshun, My name is Howard Kroll and I am the attorney representing Chris Principe in his lawsuit against you for defamation and intentional interference with contractual relations. I have attached a copy of the complaint for your review. Please give me a call at 213.430.3365 to discuss. Thanks. Howard

May 5th, 10:16am

Tim Tayshun accepted your request.



Tim

Thanks, but you may want to do a little more homework on your client and his involvement with Ruja Ignatova and the Onecoin FAKE cryptocurrency before attempting to involve me in a frivolous lawsuit and

false Accusations. Discovery works both ways, doesn't it? 😊

Howard

Yes, discovery works both ways. When are you free to discuss this?



Tim

Let me speak with my attorney and I'll let you know. That said, I'm 100% confident in my defense and look forward to this exciting opportunity. Oh, and thank you. I appreciate it, as this is definitely "news-worthy information." So, expect it to go viral internationally and to help expedite the taking down of the massive Onecoin SCAM, as well as its many accomplices in the promotion of this scam, which absolutely includes your client, Chris Principe.

Howard

[Waiver of Service of Summons.pdf](#)

Looking forward to it. In the meantime, I have attached a waiver of service of summons. Please sign and return so we can get this case rolling. Thanks.



Tim

May 5th, 1:59pm



Tim

<https://www.youtube.com/watch?v=u6oZ4gDhpws>

You "Client"

**OneCoin - "We are way bigger than Apple, Alibaba, Walmart"**

OneCoiners believe the market-cap of OneCoin will be trillions after 3 years. And according to Florian Andris, a German top leader, OneCoin will be the bigge...

[youtube.com](https://www.youtube.com)

Howard

I'm not quite sure the relevance of that video. But, that's what courtrooms and juries are for. Have you signed the waiver so we can get to court and have each side present their evidence?

Also, it may be easier to communicate by email. Please email me at howard.kroll@tuckerellis.com. Thanks.



Tim

we both know I have 60 days to sign it. There's a good possibility that Onecoin will no longer exist by that time. Good luck with building your case. I have been investigating this since March 2015. Use this time to "brush up," because you're not gonna have a cakewalk by any means.



Tim

Ps. By the end of this week Principe will likely be infamous unless you retract the complaint and issue me an apology within 24 hours



Tim

Do you or he accept payment in Onecoin, by the way? 😊

May 7th, 2:51pm



Tim

What does this mean please?

https://cdn.fbsbx.com/v/t59.2708-21/18220211_10212904020774454_2071746254831878144_n.pdf/Chris-Principe-v.-Timothy-Glen-Curry-aka-Timothy-Tayshun.-Complaint.pdf?oh=213d61664f14dc2dd397a4ccfc69ca32&oe=590E7DD9&dl=1

"URL expired"

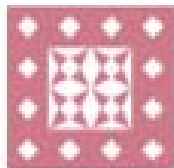


May 25th, 4:58pm

Howard

Tim, are you planning on signing the waiver?

EXHIBIT 2



Timothy Curry

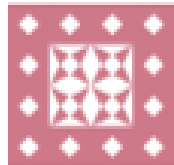
#27

May 6th, 2017 at 1:48 am (Q)

Shite is going down! HERE is "Legal Action" filed against me from Chris (unprincipled) Principe's Attorney today:

cdn.fbsbx.com/v/t59.2708-

21/18220211_10212904020774454_2071746254831878144_n.pdf/Chris-Principe-v.-Timothy-Glen-Curry-aka-Timothy-Tayshun.-Complaint.pdf?oh=213d61664f14dc2dd397a4ccfc69ca32&oe=590E7DD9&dl=1



Timothy Curry

#29

May 6th, 2017 at 2:22 am (Q)

I've attached the document and am just awaiting moderation. The attorney sent it to me over Facebook 😊

I thanked him for providing the tools to make this information go viral.

Attorney alleges that I've cost Principe "in excess of \$75,000and damaged his reputation irreparably, etc."

Calls the claims malicious, false, etc., and claims Principe "never received payments (or perks/ financial compensation) from Onecoin/ Ruja."

I think Principe is about to become famous!or it's the word "infamous?"

EXHIBIT 3



Timothy Curry

#2

Jun 16th, 2017 at 1:31 am (Q)

@GlimDropper- why yes. That would be me. Case is still “pending” in FEDERAL Court, from April 6th – meaning that I have not been properly “served” at this point in time.

Federal Rules of Civil Procedure under Rule #4 grant 90 days from original filing for Plaintiff to do so, otherwise the Court will motion to dismiss the Case “without prejudice.”

So, the next 3 weeks will be telling to see if this was just a “bluff” or not. My team is fully prepared, either way, and I’m very pleased that several “anonymous” (and other named) sources have now surfaced and reached out to us with additional information which would suggest carrying forth would be extremely disadvantageous to the party.

Therefore, at this point we’re strategizing the next step, if any at this point, and will simply “observe” any proverbial Chess moves with counter maneuvers.

I’m prepared for either a rather boring outcome, but also for anything “a bit more exciting,” ...although we won’t be “revealing our hand,” *most *likely*, unless the situation calls for it. That’s really all I’m at liberty to say at the moment.